

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

NATHAN ROBERTS, ET AL. and
FREEDOM TRUCK DISPATCH LLC, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

PROGRESSIVE PREFERRED
INSURANCE COMPANY, et al.,

Defendants.

Case No. 1:23-cv-01597-PAG

MOTION FOR ADMISSION *PRO HAC VICE* OF STEPHANIE SCHUSTER

Pursuant to Local Rule 83.5(h), Defendants Progressive Preferred Insurance Company and Progressive Casualty Insurance Company (“Progressive”), by and through one of their attorneys, Michael J. Ruttinger, of the law firm Tucker Ellis LLP, a member in good standing of the bar of this Court, respectfully move this Court for an Order admitting Stephanie Schuster *pro hac vice* as co-counsel on behalf of Progressive in the above-captioned matter. Ms. Schuster’s contact information is as follows:

Stephanie Schuster
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: (202) 373-6595
Fax: (202) 739-3001.
stephanie.schuster@morganlewis.com

Ms. Schuster is a member in good standing of the highest court of the District of Columbia, having been admitted on January 11, 2013 (bar number 1011924). No disciplinary proceedings have been filed or are pending against her, and she has not been disbarred or suspended from practice before any court, department, bureau or commission of any State in the United States.

Further, she has never received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of any bar.

A certificate of good standing issued by the District of Columbia Court of Appeals, which is offered in support of this motion, is attached hereto as Exhibit A. The undersigned is tendering the required \$120.00 filing fee with this Motion.

WHEREFORE, Progressive respectfully requests that this Court grant attorney Stephanie Schuster limited admission to appear in this Court, in this particular proceeding.

Dated: December 13, 2023

**PROGRESSIVE PREFERRED INSURANCE
COMPANY and PROGRESSIVE CASUALTY
INSURANCE COMPANY**

By its attorneys,

/s/ Michael J. Ruttinger

Michael J. Ruttinger (0083850)
TUCKER ELLIS LLP
950 Main Avenue, Suite 1100
Cleveland, OH 44113
Tel: (216) 696-4456
Fax: (216) 592-5009
E-mail: michael.ruttinger@tuckerellis.com

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2023, a copy of the foregoing Motion for Admission *Pro Hac Vice* of Stephanie Schuster was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Michael J. Ruttinger

Michael J. Ruttinger (0083850)
Tucker Ellis LLP
950 Main Avenue, Suite 1100
Cleveland, OH 44113-7213
Telephone: 216.592.5000
Facsimile: 216.592.5009
E-mail: michael.ruttinger@tuckerellis.com

*Attorney for Defendants Progressive Preferred
Insurance Company and Progressive Casualty
Insurance Company*